

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

JOHN GREENBERGER MACCABEE AND
SHERRY MORSE MACCABEE LIVING TRUST,

JOHN GREENBERGER MACCABEE,
Individually and as Trustee of the John
Greenberger Maccabee and Sherry Morse
Maccabee Living Trust, and

SHERRY MORSE MACCABEE, Individually and
as Trustee of the John Greenberger Maccabee and
Sherry Morse Maccabee Living Trust,

Defendants.

Adv. Pro. No. 10-05407 (SMB)

STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Procedures Governing Mediation of Matters and the Use of

Early Neutral Evaluation and Mediation/Voluntary Arbitration in Bankruptcy Cases and Adversary Proceedings (Local Rule 9019-1, Adopted by Order M-452 (General Order Amending and Restating M-143, M-211, and M-390)) (the “Mediation Procedures”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the parties must conclude mediation in the above-captioned case is extended up to and including October 31, 2014.

The purpose of this Stipulation is to provide additional time for the parties to resolve this matter through the mediation process as contemplated under the Mediation Procedures.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

[THIS PORTION IS INTENTIONALLY LEFT BLANK]

Dated: September 12, 2014
New York, New York

By: /s/ Donna A. Tobin
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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
Bernard L. Madoff*

Dated: September 12, 2014
New York, New York

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Maccabee and Sherry Morse Maccabee Living
Trust, John Greenberger Maccabee, and Sherry
Morse Maccabee*

Dated: September 12, 2014
New York, New York

/s/ Deborah A. Reperowitz
Deborah A. Reperowitz, Mediator

SO ORDERED:

Dated: October 6th, 2014
New York, New York

/s/ STUART M. BERNSTEIN
HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE